

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEON WEINGRAD, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

**PREMIUM MERCHANT FUNDING ONE,
LLC**

Defendant.

Case No. 2:24-cv-06247-JP

CLASS ACTION

JURY TRIAL DEMANDED

JOINT MOTION FOR EXTENSION OF TIME FOR DEADLINES

The Plaintiff and Defendant respectfully and jointly seek an extension of time with which to complete discovery and file motions and other documents in this matter by three months.

Currently, the deadlines are as follows, as are the proposed amended dates:

Event	Old Date	Proposed New Date
Close of Discovery	8/29/2025	11/28/2025
Class Certification Motions	9/5/2025	12/6/2025
Pretrial Memoranda	11/11/2025	2/11/2026
Defense Pretrial Memoranda	11/18/2025	2/18/2026
Final Pretrial Conference	12/3/2025	3/5/2026
Listed for Trial	12/8/2025	3/10/2026

The Parties respectfully submit that they have effectively used the current time and the additional time is necessary to complete discovery and effectively prepare for class certification and trial. In sum, personal issues have arisen at various points impacting counsel for both parties,

including the impacts of severe weather, as well as difficulties in scheduling deposition dates to correspond with witnesses' existing summer travel plans. As such, the parties respectfully submit that good cause has been demonstrated for the requested extension.

As such, the parties respectfully request that the deadlines in this matter be extended as above. This extension is not sought for the purposes of delay or other improper purpose.

RESPECTFULLY SUBMITTED AND DATED this July 11, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
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Attorney for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I, Andrew Roman Perrong, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

DATED this July 11, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.